

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

JERRY A. BRABAZON, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

Case No. 10-CV-714

AURORA HEALTH CARE, INC.,

Defendant.

JOINT MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

The parties, by and through their undersigned counsel, hereby move the
Court for an order:

- 1) Finally approving the Settlement Agreement, adjudging its terms to be fair, reasonable and adequate, and directing consummation of its terms and provisions;
- 2) Finally approving the payment to the Class Representative;
- 3) Finally approving Class Counsel's petition for costs and attorneys' fees, and awarding Class Counsel attorneys' fees and costs;
- 4) Finally approving the settlement payments to be paid to the Class pursuant to the allocation formulas set forth in Section 3 of the Settlement Agreement;
- 5) Approving a 30 day extension of the Notice Period for Randy Cash, Chad Cooper, Geneta Kopatich, providing these individuals an opportunity to

participate in the settlement, exclude themselves from the settlement, or file an objection to the settlement, and approving Notice to these individuals in the form attached as Exhibit A to this motion.

- 6) Dismissing the Lawsuit with Prejudice, and barring and permanently enjoining, to the fullest extent of applicable law, the Class Representative and all Class Members from pursuing Released Claims against the Defendant, as set forth in Sections 3 of the Settlement Agreement.

Dated this 21st day of October, 2011.

HAWKS QUINDEL, S.C.
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